

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

KIRA (US) INC.,)
)
)
Plaintiff,)
)
v.)
)
KENNAN SAMMAN and)
DEEPJUDGE AG,)
)
Defendants.)
)

Case No. 1:23-cv-00919

JOINT MOTION FOR STIPULATED PRELIMINARY INJUNCTION

Plaintiff Kira (US) Inc. (“Kira”) and Defendant Kennan Samman (“Samman”) move this Court, pursuant to Federal Rule of Civil Procedure 65, for entry of a Stipulated Preliminary Injunction enjoining Samman from: (a) working for DeepJudge AG until further order of this Court; and (b) disclosing or using any “Proprietary Information” or “Confidential Information” of Kira in Samman’s possession.¹ Entry of the Stipulated Preliminary Injunction also moots Kira’s requests for expedited discovery and entry a preliminary injunction. ECF Nos. 6, 9. Accordingly, the parties also respectfully request that the Court vacate its prior order (ECF No. 33) setting expedited discovery deadlines and a briefing schedule for Kira’s request for a preliminary injunction, and that the Court further cancel the August 25, 2023 preliminary injunction hearing.

¹ Samman does not admit liability and reserves all of his rights as to any and all defenses he may have in this action, as well as all rights and defenses as to any permanent injunction sought or entered in this action.

Nothing herein shall be construed as an admission that DeepJudge and Kira are competitors, or that DeepJudge’s products compete with Kira’s products.

WHEREFORE, Kira and Samman ask the Court to grant their Joint Motion for Stipulated Preliminary Injunction, and enter an Order:

1. Enjoining Samman from: (a) working for DeepJudge AG until further order of this Court; and (b) disclosing or using any “Proprietary Information” or “Confidential Information” of Kira in Samman’s possession;
2. Vacating the Court’s expedited discovery and briefing schedule (ECF No. 33);
3. Canceling the August 25, 2023 preliminary injunction hearing; and
4. Awarding such other and further relief as the Court deems just and proper.

Dated: July 31, 2023

Respectfully submitted,

By: _____ /s/
Scott M. Dinner, VSB No. 85577
NIXON PEABODY LLP
799 9th Street, NW, Suite 500
Washington, DC 20001
(202) 585-8505 (telephone)
(844) 996-1233 (facsimile)
sdinner@nixonpeabody.com

Matthew McLaughlin (*pro hac vice*)
NIXON PEABODY LLP
Exchange Place, 53 State Street
Boston, MA 02109
(617) 345-1000 (telephone)
(866) 440-6480 (facsimile)
mmclaughlin@nixonpeabody.com

Aaron F. Nadich (*pro hac vice*)
NIXON PEABODY LLP
One Citizens Plaza, Suite 500
Providence, RI 02903
401-454-1000 (telephone)
844-885-9995 (facsimile)
anadich@nixonpeabody.com

Attorneys for Kira (US) Inc.

By: _____ /s/
Joy Einstein, VSB No. 82073
Gregory Melus, VSB No. 85432
SHULMAN, ROGERS, GANDAL, PORDY, &
ECKER, P.A.
12505 Park Potomac Avenue, 6th Floor
Potomac, MD 20854
(301) 230-5200 (telephone)
(301) 230-2891 (facsimile)
jeinstein@shulmanrogers.com
gmelus@shulmanrogers.com

Eric J. Janson (*pro hac vice*)
Robert S. Terzoli (*pro hac vice*)
SEYFARTH SHAW LLP
975 F Street NW
Washington, DC 20004
(202) 463-2400 (telephone)
(202) 828-5393 (facsimile)
ejanson@seyfarth.com
rterzoli@seyfarth.com

Jesse M. Coleman (*pro hac vice*)
SEYFARTH SHAW LLP
700 Milam Street
Suite 1400
Houston, TX 77002
(713) 225-2300 (telephone)
(713) 225-2340 (facsimile)
jmcoleman@seyfarth.com

Attorneys for Kennan Samman

CERTIFICATE OF SERVICE

I certify that on this 31st day July 2023, the foregoing Joint Motion for Stipulated Preliminary Injunction was served by CM/ECF on the following:

Scott M. Dinner, VSB No. 85577
NIXON PEABODY LLP
799 9th Street, NW, Suite 500
Washington, DC 20001
(202) 585-8505 (telephone)
(844) 996-1233 (facsimile)
sdinner@nixonpeabody.com

Matthew McLaughlin (*pro hac vice*)
NIXON PEABODY LLP
Exchange Place, 53 State Street
Boston, MA 02109
(617) 345-1000 (telephone)
(866) 440-6480 (facsimile)
mmclaughlin@nixonpeabody.com

Aaron F. Nadich (*pro hac vice*)
NIXON PEABODY LLP
One Citizens Plaza, Suite 500
Providence, RI 02903
401-454-1000 (telephone)
844-885-9995 (facsimile)
anadich@nixonpeabody.com

/s /
Gregory Melus